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6 Attorneys for Debtor and Debtor in Possession

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8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **LOS ANGELES DIVISION**  
11

12 In re: Case No.: 2:21-bk-18205-DS  
13 CRESTLLOYD, LLC, Chapter 11 Case

14 Debtor and Debtor in Possession.

15 **DEBTOR'S NOTICE OF MONTHLY FEE  
STATEMENT OF SIERRA CONSTELLATION  
PARTNERS, LLC**

16  
17 [October 26, 2021 (the Petition Date) – October 31, 2021]  
18

19 [No Hearing Required, Unless Timely Opposition and  
Request for a Hearing is Filed]

1           **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter  
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*  
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence  
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United  
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)  
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor  
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*  
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on  
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*  
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider  
11 Compensation Order”) [Dkt. 77].

12           **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee  
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in  
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an  
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the  
17 Court.”

18           **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,  
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*  
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*  
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*  
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]  
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the  
24 DIP Loan Documents,<sup>1</sup> which provide, among other things, that:

25           Loan Proceeds shall be used solely in accordance with the Budget,  
26 including for payment of the Facility Fee, Lender's reasonable  
27 attorneys' fees and costs incurred in making and documenting the  
Loan, title insurance premiums, escrow fees, the Extension Fee,

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to  
2 administer the Chapter 11 Case, including insurance, repair,  
3 maintenance and construction costs with respect to the Property.  
4 With respect to the fees and costs of the Manager of the Debtor  
[i.e., SCP], Manager [i.e., SCP] shall file monthly fee statements  
5 and, absent an objection within seven (7) days thereafter, the fees  
and costs may be paid in full. In the event of an objection, the  
6 undisputed portion may be paid without prejudice to the balance  
subject to order of the Court.

7 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
8 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee  
9 Statement for the period from October 26, 2021 (the Petition Date) through and including October 31,  
10 2021. SCP reserves its right to supplement, amend, or modify the Fee Statement to include fees  
11 and/or expenses incurred during the foregoing period not covered in the attached Fee Statement or  
12 incurred subsequent to October 31, 2021.

13 Annexed as **Exhibit “A”** hereto is the name of each professional who performed services  
14 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement  
15 and the hourly rate and total fees for each professional during such period.

16 Annexed as **Exhibit “B”** hereto is the summary of hours in this Fee Statement broken up  
17 by partner and task.

18 Annexed as **Exhibit “C”** hereto are the detailed time entries for the period covered by this  
19 Fee Statement.

20 Annexed as **Exhibit “D”** hereto is the summary of expenses included in this Fee  
21 Statement.

22 Annexed as **Exhibit “E”** hereto are the detailed entries for the expenses covered by this  
23 Fee Statement.

24 **PLEASE TAKE FURTHER NOTICE that objections, if any, to this Fee Statement  
must be filed with the Court and served so as to be received by the undersigned counsel to the  
Debtor no later than seven (7) days after the filing of this Fee Statement.**

1           **PLEASE TAKE FURTHER NOTICE** that, (A) if no objection is properly and timely  
2 filed and served in accordance with the above procedures, the Debtor will pay SCP the fees and  
3 expense set forth in this Fee Statement (provided such payment is consistent with the Budget) and (B)  
4 if an objection is properly and timely filed and served in accordance with the above procedures, (1) the  
5 Debtor will pay SCP the undisputed portion of fees and expenses set forth in this Fee Statement  
6 (provided such payment is consistent with the Budget) and (2) any disputed portion of fees and  
7 expenses set forth in this Fee Statement shall be subject to review and further order by the Court.

8           Dated: January 24, 2022

CRESTLLOYD, LLC

9           */s/ Todd M. Arnold*  
10           DAVID B. GOLUBCHIK  
11           TODD M. ARNOLD  
12           LEVENE, NEALE, BENDER, YOO  
13           & GOLUBCHIK L.L.P.  
14           Attorneys for Debtor and Debtor in Possession

# **EXHIBIT “A”**

**Summary of SierraConstellation Partners Professional Fees by Consultant**

For the Period October 26th through October 31<sup>st</sup>

| <b><u>Consultant</u></b> | <b><u>Title</u></b> | <b><u>Rate</u></b> | <b><u>Hours</u></b> | <b><u>Total</u></b> |
|--------------------------|---------------------|--------------------|---------------------|---------------------|
| Lawrence Perkins         | CEO                 | \$790              | 12.4                | \$9,796.00          |
| Miles Staglik            | Senior Director     | \$580              | 5.4                 | \$3,132.00          |
| Rob Schenfeld            | Director            | \$525              | 0.4                 | \$210.00            |
| Rodrigo Verseda          | Associate           | \$235              | 29.2                | \$6,862.00          |
|                          |                     |                    | <b>47.4</b>         | <b>\$20,000.00</b>  |

# **EXHIBIT “B”**

**Summary of SierraConstellation Partners Professional Fees by Activity**  
For the Period October 26th through October 31<sup>st</sup>

| <u>Activity / Consultant</u>   | <u>Title</u>          | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|--|-----------------------|--------------|-------------|--------------|
| <b><u>Asset Sales/Financing Process Support</u></b>                  |                       |              |             |              |
| Lawrence Perkins   | CEO                   | 1.00         | \$790       | \$790        |
|  | <i>Activity Total</i> | 1.00         |             | \$790        |
| <b><u>Business Operations, Cash Management &amp; CRO Support</u></b> |                       |              |             |              |
| Lawrence Perkins   | CEO                   | 11.40        | \$790       | \$9,006      |
| Rob Schenfield   | Director              | 0.40         | \$525       | \$210        |
|  | <i>Activity Total</i> | 11.80        |             | \$9,216      |
| <b><u>Case Administration</u></b>                                    |                       |              |             |              |
| Miles Staglik  | Senior Director       | 5.40         | \$580       | \$3,132      |
| Rodrigo Virseda  | Associate             | 29.20        | \$235       | \$6,862      |
|  | <i>Activity Total</i> | 34.60        |             | \$9,994      |

# **EXHIBIT “C”**

**Summary of SierraConstellation Partners Professional Fees by Professional Service**  
 For the Period October 26th through October 31<sup>st</sup>

| <u>Date</u>   | <u>Description</u>   | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>     |
|---|--|--------------|-------------|-------------------|
| <b>Asset Sales/Financing Process Support</b>                  |  |              |             |                   |
| <i>Lawrence Perkins</i>                                       |  |              |             |                   |
| 10/26/2021  | Meeting with potential DIP lender/buyer of property  | 1.00         | \$790.00    | \$790.00          |
| <b>Business Operations, Cash Management &amp; CRO Support</b> |  |              |             |                   |
| <i>Lawrence Perkins</i>                                       |  |              |             |                   |
| 10/26/2021  | Call with potential dip lender and correspondence with same  | 0.50         | \$790.00    | \$395.00          |
| 10/26/2021  | Various calls with press re: outreach on filing  | 1.20         | \$790.00    | \$948.00          |
| 10/26/2021  | Review of applications for employment; comments and signature re: same   | 0.70         | \$790.00    | \$553.00          |
| 10/26/2021  | Review of 7 Day package requirement  | 0.50         | \$790.00    | \$395.00          |
| 10/26/2021  | Calls with insurance brokers   | 0.50         | \$790.00    | \$395.00          |
| 10/26/2021  | Call with counsel re: various workstreams  | 0.50         | \$790.00    | \$395.00          |
| 10/27/2021  | Call with insurance brokers re: policy   | 0.50         | \$790.00    | \$395.00          |
| 10/27/2021  | Call with lender   | 0.50         | \$790.00    | \$395.00          |
| 10/27/2021  | Meeting at property  | 1.00         | \$790.00    | \$790.00          |
| 10/27/2021  | Discussion with counsel re: strategy post visit  | 0.50         | \$790.00    | \$395.00          |
| 10/28/2021  | Call with owner re: status of property   | 0.50         | \$790.00    | \$395.00          |
| 10/28/2021  | Review of various analyses and calls with deal team  | 1.00         | \$790.00    | \$790.00          |
| 10/28/2021  | Correspondence with lender   | 0.70         | \$790.00    | \$553.00          |
| 10/28/2021  | Calls with potential brokers   | 1.20         | \$790.00    | \$948.00          |
| 10/29/2021  | Review of RFP and distribution to brokers  | 1.20         | \$790.00    | \$948.00          |
| 10/29/2021  | Call with lender   | 0.40         | \$790.00    | \$316.00          |
| <u>Lawrence Perkins Total</u>                                 |  |              |             | <u>\$9,006.00</u> |
| <i>Rob Schenfeld</i>  |  |              |             |                   |
| 10/28/2021  | Update call with Miles Staglik re: background to filing  | 0.40         | \$525.00    | \$210.00          |
| <u>Rob Schenfeld Total</u>                                    |  |              |             | <u>\$210.00</u>   |
| <b>Case Administration</b>                                    |  |              |             |                   |
| <i>Rodrigo Virseda</i>  |  |              |             |                   |
| 10/26/2021  | Reviewing debtor information and Ch 11 forms provided by D.Witkins and LNBYG; Gathering critical information to complete the 7-Day package | 1.00         | \$235.00    | \$235.00          |
| 10/27/2021  | Gathering critical information to complete the 7-Day package; working on DIP budget model  | 8.40         | \$235.00    | \$1,974.00        |

|                      |  |                              |          |                   |
|----------------------|--|------------------------------|----------|-------------------|
| 10/27/2021           | Preparation for and call with LNBYG, Lockton and L. Perkins to discuss insurance coverage                          | 0.50                         | \$235.00 | \$117.50          |
| 10/27/2021           | Preparation for and call with LNBYG and Skyline Dev to discuss status of 7-Day Package                             | 0.50                         | \$235.00 | \$117.50          |
| 10/28/2021           | Call with EFO Financial Group re: DIP Financing  | 0.50                         | \$235.00 | \$117.50          |
| 10/28/2021           | Teleconference with M. Staglik on case status, DIP, bank accounts and Insurance                                    | 0.90                         | \$235.00 | \$211.50          |
| 10/28/2021           | Reviewing information on debtor provided, working on DIP budget model and gathering information for 7-Day Package. | 9.60                         | \$235.00 | \$2,256.00        |
| 10/29/2021           | Working on DIP budget model and gathering information for 7-Day Package  | 3.60                         | \$235.00 | \$846.00          |
| 10/31/2021           | Working on DIP budget model and gathering information for 7-Day Package  | 4.20                         | \$235.00 | \$987.00          |
|                      |  | <u>Rodrigo Virseda Total</u> |          | <u>\$6,862.00</u> |
| <i>Miles Staglik</i> |  |                              |          |                   |
| 10/28/2021           | Teleconference with R. Virseda on case status, DIP, bank accounts and Insurance                                    | 0.90                         | \$580.00 | \$522.00          |
| 10/29/2021           | Review materials and first day filings   | 3.00                         | \$580.00 | \$1,740.00        |
| 10/30/2021           | Review documents and initial DIP budget  | 1.50                         | \$580.00 | \$870.00          |
|                      |  | <u>Miles Staglik Total</u>   |          | <u>\$3,132.00</u> |

# **EXHIBIT “D”**

**Summary of SierraConstellation Partners Expenses by Category**

For the Period October 26th through October 31<sup>st</sup>

| <u>Reimbursable Expenses</u>         | <u>Amount</u>  |
|--------------------------------------|----------------|
| Miscellaneous (Postage and Shipping) | \$70.85        |
| <b>Total Expenses</b>                | <b>\$70.85</b> |

# **EXHIBIT “E”**

**Summary of SierraConstellation Partners Expenses by Detail**

For the Period October 26th through October 31<sup>st</sup>

| <u>Activity</u>       | <u>Date</u> | <u>Employee</u>  | <u>Description</u>   | <u>Amount</u>  |
|-----------------------|-------------|------------------|----------------------|----------------|
| <b>Miscellaneous</b>  |             |                  |                      |                |
|                       | 10/26/2021  | Perkins Lawrence | Postage and Shipping | \$70.85        |
| Total Miscellaneous   |             |                  |                      | <hr/> <hr/>    |
| <b>Total Expenses</b> |             |                  |                      | <b>\$70.85</b> |

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90017.

A true and correct copy of the foregoing document entitled **DEBTOR'S NOTICE OF MONTHLY FEE STATEMENT OF SIERRA CONSTELLATION PARTNERS, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 24, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Todd M Arnold tma@lnbyg.com
- Jerrold L Bregman jbregman@bg.law, ecf@bg.law
- Marguerite Lee DeVoll mdevoll@watttieder.com
- Danielle R Gabai dgabai@danninggill.com
- Thomas M Geher tmg@jmbm.com, bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com
- David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com
- James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com
- Robert B Kaplan rbk@jmbm.com
- Jane G Kearl jkearl@watttieder.com
- Jennifer Larkin Kneeland jkneeland@watttieder.com
- Michael S Kogan mkogan@koganlawfirm.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
- Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- Sharon Oh-Kubisch sokubisch@swelawfirm.com, gcruz@swelawfirm.com;1garrett@swelawfirm.com;jchung@swelawfirm.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com
- Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;cblair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com
- William Schumacher wschumac@milbank.com, autodocketecf@milbank.com
- David Seror dseror@bg.law, ecf@bg.law
- Zev Shechtman zshechtman@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com
- Mark Shinderman mshinderman@milbank.com, dmuhrez@milbank.com;dlbatie@milbank.com
- Lindsey L Smith llis@lnbyb.com, llis@ecf.inforuptcy.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Jessica Wellington jwellington@bg.law, ecf@bg.law

**2. SERVED BY UNITED STATES MAIL:** On January 24, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 24, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 24, 2022  
*Date*

Lourdes Cruz  
*Printed Name*

/s/ Lourdes Cruz  
*Signature*

In re Crestlloyd, LLC  
D UST Receiver RSN + Amended 20  
Largest  
File No.: 9562

Debtor  
Crestlloyd, LLC  
c/o SierraConstellation Partners LLC  
355 S. Grand Avenue Suite 1450  
Los Angeles, CA 90071

Noreen A Madoyan  
Office of the United States Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

Counsel For Receiver

Brutzkus Gubner Rozansky Seror  
Weber LLP  
David Seror/Jessica Wellington  
21650 Oxnard Street, Suite 500  
Woodland Hills, CA 91367

Biabani & Associates, Inc.  
Attn: Alex Biabani  
1600 Sawtelle Bl #104  
Los Angeles, CA 90025

Bradford Sheet Metal  
4164 Sopp Road  
Mojave, CA 93501

Branden Williams  
257 N. Cannon Dr., 2nd Fl.  
Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists  
Attn: Tom Yang  
4536 Ish Drive  
Simi Valley, CA 93063

CAD Stone Works Inc.  
Attn: Cesar Hernandez  
4533 Van Nuys Bl. #201  
Sherman Oaks, CA 91403

Centurion Air, LLC  
Attn: Michael T. Pyle  
13932 Arrow Creek Road  
Draper, UT 84020

Davidson Accountancy Corp.  
William N. Davidson, CPA  
14011 Ventura Blvd., Ste. 302  
Sherman Oaks, CA 91423

Creative Art Partners  
6542 Hayes Dr.  
Los Angeles, CA 90048

Italian Luxury Design  
4 NE 39 St.  
Miami, FL 33137

Jabs Pools and Spas, LLC  
Attn: Georgina Rendon  
8055 Matilija Ave.  
Panorma City, CA 91402

Dennis Palma  
146 Beach Way  
Monterey, CA 93940

KN Coating  
201 E. Tamarack Ave  
Inglewood, CA 90301

LA DWP  
P.O. Box. 30808  
Los Angeles, CA 90030

Vesta (aka Showroom Interiors, LLC)  
Attn: Julian Buckner  
8905 Rex Road  
Pico Rivera, CA 90660

Made by TSI, Inc.  
888 Biscayne Blvd #209  
Miami, FL 33132

Midland Contractors, Inc.  
Attn: Bruce Partovi  
Po Box 8312  
Van Nuys, CA 91409

West Valley Green Landscaping, Inc.  
14761 Tupper St.  
Panorama City, CA 91402

The Vertex Companies, Inc.  
12100 Wilshire Blvd 8th floor  
Los Angeles CA 90025-0000

West Coast Gates  
339 Isis Ave.  
Inglewood, CA 90301